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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

GLORIANA URBAN,

Plaintiff,

v.

TRUMP TAJ MAHAL ASSOCIATES, LLC,
d/b/a TRUMP TAJ MAHAL CASINO RESORT;
JOHN DOES (1-5) fictitious names;
ABC CORP (1-5) fictitious entities;
XYZ COMPANY (1-5) fictitious entities;
and XYZ, LLC (1-5) fictitious entities;
j/s/a,

Defendants.

Civil Action No. _____

COMPLAINT and JURY DEMAND

Plaintiff, GLORIANA URBAN, by way of Complaint against Defendants, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT; JOHN DOES (1-5) fictitious names; ABC CORP (1-5) fictitious entities; XYZ COMPANY (1-5) fictitious entities; and XYZ, LLC (1-5) fictitious entities; j/s/a, says:

COUNT ONE

1. Plaintiff, GLORIANA URBAN, is a citizen of the Commonwealth of Pennsylvania, and resides at 1226 Broad Street, Perkasio, Bucks County, and Commonwealth of Pennsylvania. Defendant, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, is a citizen of the State of New Jersey in

that it is a corporation duly organized under the laws of the State of New Jersey with its principal place of business at 1000 Boardwalk, City of Atlantic City, County of Atlantic, and State of New Jersey. Defendants, JOHN DOES (1-5), ABC CORP (1-5), XYZ COMPANY (1-5), and XYZ, LLC (1-5), are fictitious names for entities whose identities are presently unknown, but upon information and belief, are citizens of the State of New Jersey or corporations formed under the laws of the State of New Jersey with their residence or principal place of business in New Jersey.

2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332 (Diversity of Citizenship) in that Plaintiff, GLORIANA URBAN is a citizen and resident of the Commonwealth of Pennsylvania, and Defendants TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, JOHN DOES (1-5), ABC CORP (1-5), XYZ COMPANY (1-5), and XYZ, LLC (1-5), are citizens and residents of the State of New Jersey as alleged above. The matter in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

3. On December 9, 2007, Plaintiff GLORIANA URBAN, was a patron at the premises of Defendant, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, 1000 Boardwalk, Atlantic City, New Jersey.

4. At the aforesaid date, time and place, Plaintiff, GLORIANA URBAN, was caused to slip and fall on an interior stairway in said premises.

5. Plaintiff's fall was due to the negligence of Defendant, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, which consisted of, but is not limited to, the failure to install a handrail on said stairway for the use of its patrons, in violation of common law and statutory regulations, failed to adequately maintain the carpeting and surface conditions of the stairway in a safe condition, and otherwise permitted the stairway to become a hazardous condition to the Plaintiff and the public.

6. As a direct and proximate result of the aforesaid negligence of the Defendant, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, Plaintiff GLORIANA URBAN, sustained serious and permanent injuries, including but not limited to fractures to her right tibia and fibula requiring multiple surgeries, which included open reduction and internal fixation consisting of the insertion of a plate and screws; significant and permanent surgical scarring and disfigurement; has incurred, and in the future will incur, expenses for the treatment of her injuries; has been disabled, and in the future will be disabled, and not able to perform her usual functions; has sustained and in the future will sustain, the loss of

hedonic damages; has sustained, and will sustain, great pain and suffering, and other damages.

WHEREFORE, Plaintiff, GLORIANA URBAN, demands judgment against Defendant TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, for compensatory damages, interest and cost of suit.

COUNT TWO

7. Plaintiff, GLORIANA URBAN, repeats and incorporates all allegations paragraphs 1 through 6 of Count One above as if fully set forth herein at length.

8. At all times material, Defendants, JOHN DOES (1-5), ABC CORP (1-5), XYZ COMPANY (1-5), and XYZ, LLC (1-5), were entities whose identities are presently unknown, and who were agents, employees, contractors, independent contractors, architects, engineers, or other entities engaged by Defendant, TRUMP TAJ MAHAL ASSOCIATES, LLC, d/b/a TRUMP TAJ MAHAL CASINO RESORT, to design, construct, and/or maintain the aforesaid stairway area.

9. Defendants, JOHN DOES (1-5), ABC CORP (1-5), XYZ COMPANY (1-5), and XYZ, LLC (1-5), designed, constructed, and/or maintained the aforesaid stairway area in a negligent and careless manner, resulting in the damages to Plaintiff, GLORIANA URBAN, as aforesaid

WHEREFORE, Plaintiff, GLORIANA URBAN, demands judgment against Defendants, JOHN DOES (1-5), ABC CORP (1-5), XYZ COMPANY (1-5), and XYZ, LLC (1-5), for compensatory damages, interest and cost of suit.

ROBERT A. FINEBERG, P.C.

Dated: 12/01/09 By: s/Robert A. Fineberg
Robert A. Fineberg, Esquire (1307)
Attorney for Plaintiff,
Gloriana Urban

JURY DEMAND

The Plaintiff, GLORIANA URBAN, hereby demands trial by a jury on all of the triable issues of this Complaint.

ROBERT A. FINEBERG, P.C.

Dated: 12/01/09 By: s/Robert A. Fineberg
Robert A. Fineberg, Esquire (1307)
Attorney for Plaintiff,
Gloriana Urban